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11 *Co-Counsel to the WHC Liquidation Trust*

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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN JOSE DIVISION**

16 JEREMY ROSENTHAL, AS LIQUIDATION  
 17 TRUSTEE OF THE WHC LIQUIDATION  
 17 TRUST,

18                   Plaintiff,

19                   v.

20 HALSEN HOLDINGS, LLC, a California  
 21 limited liability company; SOUTH TEXAS  
 21 ASSOCIATES & RESOURCES, a California  
 22 corporation; PENINSULA HEALTHCARE  
 22 MANAGEMENT LLC, a Nevada limited  
 23 liability company; DANIEL BROTHMAN, an  
 23 individual; EDITH BROTHMAN, an  
 24 individual; STACY SEAN FOWLER, an  
 24 individual; EDMUND C. KING, an  
 25 individual; and DOES 1 through 100,  
 25 inclusive,

26                   Defendants.

Case No. 5:23-cv-06216-EKL

**STIPULATION FOR DISMISSAL &  
[PROPOSED] ORDER**

Courtroom: 7

Judge: Eumi K. Lee

Complaint Filed: December 1, 2023

Trial Date: None

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1 Plaintiff Jeremy Rosenthal, in his capacity as the Liquidation Trustee of the WHC  
 2 Liquidation Trust and representative of the bankruptcy estates of Watsonville Hospital Corporation  
 3 and certain of its affiliates and Defendants Halsen Holdings, LLC, South Texas Associates &  
 4 Resources, Peninsula Healthcare Management LLC, Daniel Brothman, Edith Brothman, Stacy Sean  
 5 Fowler, and Edmund C. King hereby jointly stipulate under FRCP 41(a)(1)(A)(ii) that this action be  
 6 dismissed with prejudice as to all claims, causes of action, and parties, with each party bearing that  
 7 party's own attorneys' fees and costs.

8 **IT IS SO STIPULATED.**

9 Dated: November 12, 2024

**PERKINS COIE LLP**

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17 *Counsel to Plaintiff  
 18 Jeremy Rosenthal, as Liquidation  
 19 Trustee of the WHC Liquidation Trust*

20 Dated: November 12, 2024

**KAUFMAN DOLOWICH, LLP**

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29 *Counsel to Defendants  
 30 Halsen Holdings, LLC, South Texas  
 31 Associates & Resources, Peninsula  
 32 Healthcare Management, LLC, Daniel  
 33 Brothman, Edith Brothman, Stacy Sean  
 34 Fowler, and Edmund C. King*

1                   **Attestation Pursuant to Civil Local Rule 5-1(i)(3)**

2                   I, Paul S. Jasper, attest that concurrence in the filing of this document has been obtained  
3 from any other signatory to this document.

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5 Dated: November 12, 2024

*/s/ Paul S. Jasper*

Paul S. Jasper, Bar No. 200138

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8                   **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

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10 Dated: \_\_\_\_\_, 2024

11                   Hon. Eumi K. Lee

12                   United States District Judge

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